

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOE J.W. ROBERTS, JR.,

Plaintiff,

v.

VILMA KHOUNPHIXAY, et al.,

Defendants.

NO. 2:18-cv-0746-MJP-BAT

MOTION AND JOINT  
STIPULATION TO MODIFY  
DEADLINES AND PROPOSED  
ORDER

**MOTION**

The parties submit the following Motion and Joint Stipulation for an Order modifying the Deadlines in this Court's Pre-Trial Scheduling Order, Dkt. 91, to extend all deadlines by approximately six weeks in accordance with Fed. R. Civ. P. 16(b)(4).

**I. JOINT STIPULATION**

The parties jointly stipulate to extend all the deadlines in this Court's Pre-Trial Scheduling Order, Dkt. 91, by approximately six weeks. This stipulation would set the deadline for non-expert discovery to be completed from November 15, 2019 to **December 27, 2019**. This stipulation would set the deadline for the disclosure of experts from December 15, 2019 to **January 27, 2020**. This stipulation would set the deadline for expert discovery to be completed from January 31, 2020 to **March 13, 2020**. This stipulation would set the deadline to file and

1 serve any dispositive motion from February 18, 2020 to **March 27, 2020**. The parties stipulate  
2 to extend these deadlines to allow time for the parties finish some remaining fact witness  
3 depositions. In addition, there is a pending Motion to Dismiss currently before the Court  
4 regarding the claims against the Department of Corrections. Dkt. 95. The parties also stipulate  
5 to extend these deadlines in order to avoid unnecessary litigation over discovery matters while  
6 that motion is pending. This extension will not affect any other deadlines including the trial date,  
7 which is currently set for **July 20, 2020**.  
8

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16 Attorneys for Plaintiff

17 DATED this 8th day of November 2019.

18 ROBERT W. FERGUSON  
19 Attorney General

20 By: s/ Aaron Williams  
21 Aaron Williams, WSBA #46044  
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23 Attorney for Defendants

24 DATED this 8th day of November 2019.  
25  
26

**ORDER**

Based on the stipulation of the parties, the Court **ORDERS:**

1. The stipulation of the parties is **GRANTED**;
2. The non-expert discovery cutoff deadline is moved to **December 27, 2019**;
3. The deadline for disclosure of experts is moved to **January 27, 2020**;
4. The expert discovery cutoff deadline is moved to **March 13, 2020**;
4. The deadline to file and serve any dispositive motion is moved to **March 27, 2020**;
5. The Clerk shall send copies of this Order to counsel for all parties.

IT IS SO ORDERED this 14th day of November 2019.



Marsha J. Pechman  
United States District Judge

Presented By:

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Law Office of Jennifer Horwitz, PLLC

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Attorney for Defendants

DATED this 8th day of November 2019.

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically filed the foregoing DOCUMENT with the Clerk of the Court using the CM/ECF system, which will notify the following CM/ECF participants:

Jennifer Horwitz [jennifer@jenniferhorwitzlaw.com](mailto:jennifer@jenniferhorwitzlaw.com)

Harry Williams IV [harry@harrywilliamsllaw.com](mailto:harry@harrywilliamsllaw.com)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 8th day of November 2019, at Olympia, Washington.

s/ Kathy Anderson  
KATHY ANDERSON, Legal Assistant  
Corrections Division